

ZASTROW EXHIBIT 4

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Video Deposition of Elisabeth Huber - January 5, 2009

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UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

LeMOND CYCLING, INC.,

Plaintiff,

vs.

Case No. 08-1010

TREK BICYCLE CORPORATION,

Defendant/Third-Party

Plaintiff,

vs.

GREG LeMOND,

Third-Party Defendant.

Video Deposition of ELISABETH HUBER

Monday, January 5th, 2009

9:33 a.m.

at

GASS WEBER MULLINS, LLC
309 North Water Street, Suite 700
Milwaukee, Wisconsin 53202

Reported by Julie K. Lyle, RPR/RMR/CRR

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1 Q But even backing up a step, it's available to
2 Trek employees --

3 A Current Trek employees.

4 Q -- for personal use?

5 A Uhm-uhm.

6 Q In practice, is it used by nonemployees?

7 A No.

8 Q What was the rationale for Greg LeMond's use of
9 the employee pricing? Was he considered an
10 employee?

11 A Pricingwise, yes. But for him, he was considered
12 somebody to be a prominent cycling figure and
13 that he had contacts in the media, and he was
14 allowed to go beyond the normal employee
15 limitations because he wanted to get out and sell
16 his bike line. And we also wanted to keep him
17 and his family on the most current year product.

18 Q Is there anybody else, to your knowledge, at Trek
19 who had that right?

20 A I have no knowledge since I've not worked with
21 anybody else except Greg LeMond.

22 Q So you don't know if other prominent cyclists
23 with whom Trek has a relationship, for example,
24 Gary Fisher, if he has the ability to avail
25 himself of employee pricing?

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1 Q And can you tell me, when you read his
2 deposition, having worked with him over a number
3 of years, was what you saw him talk about, was it
4 consistent or inconsistent with your
5 understanding of -- of his rights under the
6 employee purchase program?

7 MS. RAHNE: Object to the form. That's
8 vague as to what you're referencing.

9 MR. WEBER: You can answer.

10 MS. RAHNE: You can totally answer.

11 THE WITNESS: Okay. I felt it was
12 inconsistent.

13 BY MR. WEBER:

14 Q And why is that?

15 A Because going back and looking also at the
16 e-mails that were provided by his counsel, and
17 what he was using this for wasn't what I thought
18 it was for and what I thought it should be for.
19 And that my understanding of this purchase
20 program was to further his bike line, and I
21 didn't feel that it did that in any way, shape,
22 or form.

23 MR. WEBER: That's all I have. Thank
24 you.

25 THE WITNESS: Thank you.